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Attorneys for Plaintiff  
LIBERTY MUTUAL INSURANCE COMPANY

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Liberty Mutual Insurance Company,	)	Case No.: C 06 2022 SC
	)	
Plaintiff,	)	<b>REQUEST TO ENTER DEFAULT;</b>
	)	
vs.	)	<b>DECLARATION OF MELODEE A. YEE</b>
	)	
Michael T. Blatt,	)	
	)	
Defendant.	)	
	)	
	)	

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Plaintiff LIBERTY MUTUAL INSURANCE COMPANY hereby requests that the Clerk of the above-entitled Court enter default in this matter against defendant Michael T. Blatt on the ground that said defendant has failed to appear or otherwise respond to the complaint within the time prescribed by the Federal Rules of Civil Procedure. Plaintiff served the complaint on defendant Michael T. Blatt on April 3, 2006, evidenced by the proof of service of summons on file with this court.

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1 The above-stated facts are set forth in the accompanying declaration of Melodee  
2 A. Yee, Esq. filed herewith.

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4 DATED: May 1, 2006

PETERSON & BRADFORD LLP

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6  
7 By: 

Ronald J. Skocypec, Esq.  
Melodee A. Yee, Esq.  
Attorneys for Plaintiff  
Liberty Mutual Insurance Company

**DECLARATION OF MELODEE A. YEE**

I, Melodee A. Yee, declare:

1. I am an attorney licensed to practice before the United States District Court for the Northern District of California, all courts in the State of California and am a member of the law firm of Peterson and Bradford, LLP, attorneys of record for plaintiff Liberty Mutual Insurance Company ("Liberty") in the instant action. This declaration is filed in support of Liberty's request for entry of default against defendant Michael Blatt. I have personal knowledge of the facts stated herein. If called and sworn as a witness, I could and would competently testify to the following:

2. Defendant Michael Blatt was served with the summons, complaint and the supplemental documents provided by this court. Attached hereto as Exhibit "A" for the court's convenience is a true and correct copy of the proof of service previously filed with the court evidencing same.

3. Defendant served by substitute service under Federal Rule of Civil Procedure 4(e)(2) on April 3, 2006. See Exhibit "A."

4. Defendant has failed to file a responsive pleading or motion within the time permitted by law. Fed.R.Civ.P. 12(a)(1).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on this 1<sup>st</sup> day of May, 2006.

  
Melodee A. Yee